

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268

RETAIL GROUND AND PARCEL SELECT GROUND  
SERVICE STANDARD CHANGES, 2022

Docket No. N2022-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO QUESTION  
19 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 3**  
(April 20, 2022)

The United States Postal Service hereby provides its response to the above-listed question of the Presiding Officer's Information Request No. 3, issued on April 8, 2022. The question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno  
Chief Counsel  
Global Business & Service Development

Christopher M. O'Connell  
Andrew L. Pigott  
C. Dennis Southard IV  
Attorneys

475 L'Enfant Plaza, SW  
Washington, DC 20260-1135  
dennis.southard@usps.gov  
(202) 268-6284  
April 20, 2022

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRAY TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 3**

19. Please refer to Library Reference USPS-LR-N2022-1-NP4, Excel file "Cost Analysis.xlsx."
- a. Please refer to tabs "Viable from Model" and "Viable Pivot." Please explain the difference between the data and the analysis included in the two tabs.
  - b. Please explain the analysis included in tab "Multiple Trips initially, air."
  - c. Please confirm that the Postal Service evaluated cost-effectiveness of surface transportation by "placing" modeled RG, PSG, FCPS, and FCM capacity on share surface transportation.
    - i. If confirmed, please confirm that the Postal Service currently places FCPS and FCM on shared surface transportation.
    - ii. If confirmed, please confirm that the Postal Service will place FCPS, FCM, RG, and PSG on shared surface transportation, following addition of RG and PSG to the FCPS flow and implementation of the FCPS service standards. If not confirmed, please explain whether the number of trips used in the Postal Service's analysis calculating costs of surface transportation represent underestimates, and whether this could lead to either more trips added to the inter-SCF network or more volumes transported by air than is projected in the instant proceeding.
  - d. Please provide the number of surface lanes that the Postal Service determined more cost effective than air lanes, of those air lanes determined to have viable surface counterpart lanes in the Model Excel file.
  - e. Please explain why the Postal Service calculated cost of surface transportation for only the origin P&DCs - destination STCs portions of volumes' journeys. In the provided response, please address the fact that origin P&DC – destination STC mileages represent only between 35 and 82 percent of total mileages between individual origin P&DC - destination SCF pairs.<sup>1</sup>
  - f. For each of FCPS and FCM, please provide the percentages of volumes transported via the air network in the current FCPS mode matrix, as well as in the resulting network, with cost-effective transportation mode assignments for individual lanes.

**Response:**

Please see the response filed under seal as part of USPS-LR-N2022-1/NP11.

---

<sup>1</sup> See Library Reference USPS-LR-N2022-1-NP4, Model Excel file.